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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

GONG.IO, INC.,

Plaintiff,

v.

HYPERDOC INC. D/B/A RECALL.AI,

Defendant.

Case No. 5:25-cv-1026-NW

**STIPULATED REQUEST FOR ORDER  
CHANGING TIME AND ~~PROPOSED~~  
ORDER**

Judge: Hon. Noël Wise  
**DEMAND FOR JURY TRIAL**

**\*\*\*AS MODIFIED\*\*\***

Pursuant to N.D. Cal. Civil Local Rule 6-2, Plaintiff Gong.io, Inc., (“Gong”) and Defendant Hyperdoc Inc. d/b/a Recall.ai (“Recall”) file this stipulated request for an order changing time to request that:

1. The deadline for Disclosure of Asserted Claims and Infringement Contentions (Patent L.R. 3-1 and 3-2) be moved from July 25, 2025, to August 8, 2025—an extension of ten business days to accommodate unforeseen personal circumstances affecting a key consultant.

To maintain the deadlines contemplated in the Civil and Patent Local Rules in view of the above extension, and to accommodate holidays, the parties further stipulate and request that:

2. The deadline for the Invalidity Contentions (Patent L.R. 3-3 and 3-4) be moved from September 10, 2025, to September 22, 2025;
3. The deadline for Exchange of Proposed Terms for Construction (Patent L.R. 4-1) be moved from September 24, 2025, to October 6, 2025.
4. The deadline to Exchange Preliminary Claim Constructions and Extrinsic Evidence (Patent L.R. 4-2) be moved from October 15, 2025, to October 27, 2025.
5. The deadline for Damages Contentions be moved from October 30, 2025, to November 12, 2025.
6. The deadline for the Joint Claim Construction and Prehearing Statement and Expert Reports (Patent L.R. 4-3) be moved from November 12, 2025, to November 21, 2025.
7. The deadline for Responsive Damages Contentions (Patent L.R. 3-9) be moved from December 1, 2025, to December 11, 2025.
8. The deadline for the Completion of Claim Construction Discovery (Patent L.R. 4-4) be moved from December 4, 2025, to December 21, 2025.
9. The deadline for the Opening Claim Construction Brief (L.R. 4-5(a)) be moved from December 19, 2025, to January 5, 2026.
10. The deadline for the Responsive Claim Construction Brief (Patent L.R. 4-5(b)) be

1 moved from January 9, 2026, to January 20, 2026.

2 11. The deadline for the Reply Claim Construction Brief (Patent L.R. 4-5(c)) be  
3 moved from January 16, 2026, to January 26, 2026.

4 12. The deadline for the Damages Contention Meeting (Patent L.R. 3-10) be moved  
5 from January 30, 2026, to February 9, 2025.

6 The current schedule and the parties' requested modifications are summarized below:

| 7  | Event  | Current Deadline                | Requested Modification    |
|----|--|---------------------------------|---------------------------|
| 8  | Disclosure of Asserted<br>Claims and Infringement<br>Contentions (Patent L.R. 3-1<br>9 and 3-2)    | July 25, 2025                   | August 8, 2025            |
| 10 | Invalidity Contentions (Patent<br>L.R. 3-3 and 3-4)  | September 10, 2025              | September 22, 2025        |
| 11 | Exchange of Proposed Terms<br>for<br>12 Construction (Patent L.R. 4-<br>1)                         | September 24, 2025              | October 6, 2025           |
| 13 | Exchange of Preliminary<br>Claim<br>14 Constructions and Extrinsic<br>Evidence (Patent L.R. 4-2)   | October 15, 2025                | October 27, 2025          |
| 15 | Damages Contentions (Patent<br>L.R. 3-8)   | October 30, 2025                | November 12, 2025         |
| 16 | Joint Claim Construction and<br>Prehearing Statement and<br>17 Expert Reports (Patent L.R.<br>4-3) | November 12, 2025               | November 21, 2025         |
| 18 | Responsive Damages<br>Contentions  | December 1, 2025                | December 11, 2025         |
| 19 | Completion of Claim<br>Construction Discovery  | December 4, 2025                | December 21, 2025         |
| 20 | Opening Claim Construction<br>Brief (Patent L.R. 4-5(a))   | December 19, 2025               | January 5, 2026           |
| 21 | Complete ADR   | December 31, 2025               | -                         |
| 22 | Responsive Claim<br>Construction Brief (Patent<br>L.R. 4-5(b))                                     | January 9, 2026                 | January 19, 2026          |
| 23 | Reply Claim Construction<br>Brief (Patent L.R. 4-5(c))   | January 16, 2026                | January 26, 2026          |
| 24 | Tutorial hearing   | <del>January 21, 2026 2pm</del> | February 18, 2026 at 2 pm |
| 25 | Damages Contention Meeting<br>(Civ. L.R. 3-10)   | January 30, 2026                | February 9, 2025          |

| Event   | Current Deadline  | Requested Modification |
|---|---|------------------------|
| Claim construction hearing                      | <del>February 4, 2026 at 2pm</del>  | March 4, 2026 at 2 pm  |
| Close of Fact Discovery                         | April 17, 2026  | -                      |
| Opening Expert Reports                          | May 15, 2026  | -                      |
| Rebuttal Expert Reports                         | June 12, 2026   | -                      |
| Close of Expert Discovery                       | July 3, 2026  | -                      |
| Deadline to File<br>Dispositive/Daubert Motions | Motions: July 24, 2026<br>Responses: August 7, 2026<br>Replies: August 14, 2026 | -                      |
| Last Day to Hear<br>Dispositive/Daubert Motions | September 16, 2026 at 9:00<br>a.m.  | -                      |
| Joint Pretrial Conference<br>Statement          | November 4, 2026  | -                      |
| Pretrial Conference                             | November 18, 2026 at 2:00<br>p.m.   | -                      |
| Trial   | November 30, 2026 at 9:00<br>a.m. (5 days)                                      | -                      |

The prior time modifications in the case were rescheduling the Case Management Conference (ECF No. 19), a stipulated extension for Recall to respond to the complaint (ECF No. 23), and a stipulated extension in light of Defendants' counsel's trial schedule (ECF No. 37). The proposed modifications do not affect any hearing dates, discovery cutoffs, dispositive motion deadlines, or trial.

Pursuant to Civ. L.R. 6-2, a supporting declaration is attached.

1 Dated: July 22, 2025

ORRICK, HERRINGTON & SUTCLIFFE LLP

2  
3 By: /s/ Raghav Krishnapriyan  
4 Raghav Krishnapriyan

5 *Attorneys for Plaintiff*  
6 GONG.IO, INC.

7 Dated: July 22 2025

MORRISON & FOERSTER LLP

8  
9 By: /s/ Timothy C. Saulsbury  
10 Timothy C. Saulsbury

11 *Attorney for Defendant*  
12 HYPERDOC INC. d/b/a RECALL.AI  
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**Attestation Re Electronic Signatures**

I, Raghav Krishnapriyan, attest pursuant to Northern District Local Rule 5-1(i)(3) that all other signatories to this document, on whose behalf this filing is submitted, concur in the filing's content and have authorized this filing. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: July 22, 2025

By: /s/ Raghav Krishnapriyan  
Raghav Krishnapriyan

**[~~PROPOSED~~] ORDER**

Good cause appearing, Gong.io, Inc and Hyperdoc Inc. d/b/a Recall.ai's Request for Order


Changing Time is **GRANTED AS MODIFIED.**

**\*\*\*The parties' stipulation has incorrect dates. The Technology Tutorial is on February 18, 2026, at 2 p.m. The Claim Construction Hearing is on March 4, 2026, at 2 p.m. See ECF No. 37.**

**PURSUANT TO STIPULATION, IT IS SO ORDERED.**

Dated: **July 24, 2025**

By: \_\_\_\_\_

  
Honorable Noël Wise  
United States District Court Judge